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### *Counsel for Defendants*

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

1 Pursuant to Civil Local Rules 6-1, 7-4(b), and 7-11, Defendants hereby move unopposed for  
2 (1) a three-hour extension to their deadline to file by noon today their oppositions to Plaintiff State of  
3 Washington's Motion for Preliminary Injunction and to Plaintiffs' Motion for Compliance, such that  
4 Defendants' oppositions would be due at 3pm PDT; and (2) a five-page increase in the page limit of  
5 Defendants' opposition to Washington's PI Motion, such that Defendants' brief could be up to 30 pages.

6 1. The Court ordered Defendants to respond to any PI motion brought by the State of  
7 Washington and to any PI compliance motion brought by Plaintiffs by March 31, 2025, at noon PDT.  
8 *See* Dkt. No. 152. Defendants have been diligently preparing their responses to Plaintiffs' motions since  
9 those motions were filed on March 26. *See* Dkt. Nos. 155, 156. Due to the need to coordinate with the  
10 two-dozen agency defendants, Defendants respectfully request three additional hours to submit their  
11 responses to Plaintiffs' motions, such that they would be due at 3pm PDT on March 31, 2025.

12 2. In preparing their opposition to Washington's PI Motion, Defendants have determined  
13 that they need an additional five pages beyond the 25-page limit set by Civil L.R. 7-4(b) to sufficiently  
14 brief the issues presented, such that the brief could be up to 30 pages in length. This Court's Local Civil  
15 Rules allow a party to file a brief in excess of the Court's page limitations if requested by administrative  
16 motion prior to the due date. *See* Civil L.R. 7-4(b), 7-11.

17 3. Defendants contacted Plaintiffs' counsel to obtain their position on the relief requested  
18 herein. *See* Declaration of Kelsey J. Helland ¶ 2. Plaintiffs' counsel responded that Plaintiffs do not  
19 object to the relief requested herein. *See id.* ¶¶ 3-4. Defendants indicated that they would inform the  
20 Court of Plaintiffs' position.

21  
22 For good cause shown above, Defendants respectfully request that the Court grant a three-hour  
23 extension to today's filing deadlines and allow Defendants to file a brief in opposition to Washington's  
24 PI motion of up to 30 pages in length.

25 ///

1 DATED: March 31, 2025

Respectfully submitted,

2 PATRICK D. ROBBINS (CABN 152288)  
3 Acting United States Attorney  
4 PAMELA T. JOHANN (CABN 145558)  
5 Chief, Civil Division

6 *s/ Kelsey J. Helland*  
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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, *et al.*

Plaintiffs,

V.

UNITED STATES OFFICE OF PERSONNEL  
MANAGEMENT, *et al.*,

## Defendants.

Case No. 3:25-cv-1780-WHA

**DECLARATION OF KELSEY J.  
HELLAND IN SUPPORT OF  
DEFENDANTS' ADMINISTRATIVE  
MOTION FOR 3-HOUR EXTENSION  
AND INCREASED PAGE LIMIT**

The Hon. William H. Alsup

1 I, Kelsey J. Helland, declare, pursuant to 28 U.S.C. § 1746 and Local Rule 7-3, as  
2 follows:

3 1. I am a member in good standing of the State Bar of California and am admitted as  
4 a federal attorney in this Court. I represent all of the Defendants in this action.

5 2. On March 31, 2025, my co-counsel James Todd emailed counsel for Plaintiffs  
6 requesting Plaintiffs' position on Defendants' requests for (1) a three-hour extension of  
7 Defendants' deadline to file oppositions to Plaintiff State of Washington's Motion for  
8 Preliminary Injunction and Plaintiffs' Motion for Compliance with the Preliminary Injunction;  
9 and (2) a six-page increase in the page limit for Defendants' opposition to Washington's PI  
10 Motion.

11 3. Counsel for Plaintiffs Danielle Leonard responded indicating Plaintiffs had no  
12 objection to the requested three-hour extension.

13 4. Counsel for Plaintiff State of Washington Cynthia Alexander also responded,  
14 indicating that Washington did not object to the requested three-hour extension and did not  
15 object to the request to increase the page limit, so long as Defendants would agree that any reply  
16 brief by the State of Washington could be up to 21 pages. I responded that Defendants agreed to  
17 such a request.

18 5. Following Defendants' communications with Plaintiffs' counsel, Defendants  
19 determined that they only needed five additional pages, rather than six.

20  
21 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true  
22 and correct.

23  
24 Dated: March 31, 2025

25  
26  
27 \_\_\_\_\_/s/ *Kelsey J. Helland* \_\_\_\_\_  
28 KELSEY J. HELLAND

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**UNITED STATES DISTRICT COURT  
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AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, *et al.*

Plaintiffs,

V.

UNITED STATES OFFICE OF PERSONNEL  
MANAGEMENT, *et al.*,

## Defendants.

Case No. 3:25-cv-1780-WHA

**[PROPOSED] ORDER GRANTING  
ADMINISTRATIVE MOTION FOR 3-  
HOUR EXTENSION AND INCREASED  
PAGE LIMITS RE: PRELIMINARY  
INJUNCTION BRIEFING**

1 **[PROPOSED] ORDER**

2 Good cause appearing, Defendants' Unopposed Administrative Motion for 3-Hour  
3 Extension and Increased Page Limits Re: Preliminary Injunction Briefing is hereby GRANTED.  
4 Defendants' oppositions to Plaintiff State of Washington's Motion for Preliminary Injunction  
5 and Plaintiffs' Motion for Compliance with Preliminary Injunction shall be due March 31, 2025,  
6 at **3:00 p.m. PDT**. Defendants may file a brief in opposition to Washington's Motion for  
7 Preliminary Injunction of up to 30 pages.

8  
9  
10 DATED: **March 31, 2025**

11   
12 HON. WILLIAM H. ALSUP  
13 United States District Judge